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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the

Federal Communications Commission

Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Section 73.622(b)	)	MM Docket No. _____
Digital Television Table of Allotments	)	RM-_____
Pittsburg, Kansas	)	

To: Chief, Video Services Division

PETITION FOR RULE MAKING

Saga Quad States Communications, Inc. ("Saga"), licensee of television station KOAM-TV (NTSC Channel 7), Pittsburg, Kansas, by its undersigned attorneys and pursuant to Section 1.401 of the Commission's rules, hereby petitions the Commission to amend Section 73.622(b) of its rules to substitute DTV Channel 13 for DTV Channel 30 at Pittsburg, Kansas, as the digital television channel assigned to KOAM-TV.

As demonstrated by the attached Engineering Exhibit which supports KOAM-TV's future application for a digital construction permit should the instant Petition be granted, DTV Channel 13 can be allotted to KOAM-TV for digital television using the station's authorized NTSC transmitter site, in full compliance with all applicable coverage and allocation criteria. Specifically, the allocation of DTV Channel 13 to Pittsburg, Kansas, at the KOAM-TV site will permit coverage of the entire community of Pittsburg with the requisite 36 dBu contour. In addition, the allocation meets the *de minimis* 2%/10% interference procedures outlined in the FCC's DTV Processing Guidelines. Also, the proposal is not in proximity to the Canadian or Mexican border areas. Moreover, there is no adverse impact expected on any Class A TV stations.

Should the Commission allocate the channel requested herein, Saga will promptly apply for a construction permit for the facility and undertake to build and operate the station if the permit is granted.

There are ample public interest grounds to support this request. Allotment of a VHF channel, rather than a UHF channel, is necessary to facilitate the introduction of digital television service to the largely rural area served by KOAM-TV. In order to implement DTV channel 30 at Pittsburg, Kansas, Saga would be required to construct a new tower facility because Saga believes the current tower used by KOAM-TV for Channel 7 NTSC operations cannot support the weight of an additional UHF antenna for DTV Channel 30 (although the existing tower would support the weight of a VHF antenna capable of radiating both a VHF analog and VHF DTV signal through the use of a combiner and a common transmission line to a common VHF antenna). Use of Channel 13 at Pittsburg would resolve this problem. If Saga did not have to construct a new tower to support an additional UHF antenna, it believes it could avoid any issues raised by the Federal Aviation Administration. Utilization of UHF Channel 30 at Pittsburg would require Saga to install a significantly larger and more costly transmitter and transmission line and operate with a higher and, therefore, more costly power output level than necessary for DTV operations on a VHF channel using a combined antenna. The increased cost of constructing a new tower to support a UHF antenna and increased equipment costs and the additional costs of operating a UHF DTV facility presents a serious barrier to the implementation of DTV service in a small community like Pittsburg (1990 population, 17,775). This barrier could be removed or greatly lessened by adopting Saga's proposal. Additionally, use of DTV Channel 13 would more nearly allow Saga to replicate the analog signal of KOAM-TV, Channel 7, using a greatly reduced power level. Saga notes that the Chief, Video Services Division, in

Lead, South Dakota, DA 00-2597, released November 24, 2000, proposed to substitute DTV Channel 10 for Channel 30 at Lead, South Dakota, on similar grounds.

For the foregoing reasons, Saga respectfully requests that the Commission, on an expedited basis, commence a rule making proceeding as requested herein and that it substitute DTV Channel 13 for DTV Channel 30 at Pittsburg, Kansas, as the digital television channel assigned to KOAM-TV for use by KOAM-DT.

Respectfully submitted,

SAGA QUAD STATES COMMUNICATIONS, INC.

By:_____
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December 12, 2000

ENGINEERING EXHIBIT
IN SUPPORT OF PETITION FOR RULE MAKING
TELEVISION STATION KOAM-TV
PITTSBURG, KANSAS

December 5, 2000

ENGINEERING EXHIBIT
IN SUPPORT OF PETITION FOR RULE MAKING
TELEVISION STATION KOAM-TV
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Engineering Statement

This Amended Engineering Exhibit was prepared on behalf of television broadcast station KOAM-TV, Pittsburg, Kansas, in support of a petition for rule making. KOAM-TV is paired with a DTV channel allotment on Channel 30. KOAM-TV was allotted Channel 30 with a maximum effective radiated power (ERP) of 667.9 kW using a directional antenna and an antenna height above average terrain (HAAT) of 332 m.* The purpose of this petition is to propose Channel 13 in lieu of Channel 30 for KOAM-TV's DTV transitional channel.

The petitioner proposes that Channel 13 be allotted with an ERP 4.2 kW using a non-directional antenna with an antenna height above mean sea level of 607 m AMSL. This is translates to an antenna height above average terrain (HAAT) of 336 m based on the use of the U.S.G.S. 3-second terrain database. The proposed geographic coordinates for the Channel 13 allotment would be the nearly the same as KOAM-TV's Channel 30 allotment; revised by to harmonize with the antenna structure registration data for the KOAM-TV tower.†

A detailed allocation study using an implementation of the FCC OET Bulletin No. 69 interference analysis procedure was prepared for the proposed

* This is based on the KOAM-TV licensed radiation center height above mean sea level of 604 m.
† Coordinates: 37-13-15N / 94-42-23W based on NAD27.

Channel 13 allotment.[‡] As detailed in Figure 1, the proposed Channel 13 allotment meets the *de minimis* 2%/10% interference procedures outlined in the FCC's DTV Processing Guidelines[§] that is applied in evaluating requests for modification of initial DTV allotments under Section 73.623(c)(2) of the FCC Rules. Also, the proposal is not in proximity to the Canadian or Mexican border areas.

A summary of the revised service area and population numbers as they would appear in the Appendix B of the FCC's *Sixth Report and Order* and subsequent *Second Memorandum Opinion and Order* are summarized below:

State and City	NTSC Channel	DTV Chan	DTV Power (kW)	Antenna HAAT (m)	DTV Service During Transition	
					Area (sq. km)	People (Thous)
KS PITTSBURG	7	13	4.2	336.0 (607 m AMSL)	19848	358

Figure 2 is a map showing the predicted coverage comparison between KOAM-TV Channel 7 Grade B coverage and that of KOAM-DT on Channel 13 as proposed herein. Also shown for reference is the predicted 57 dBu, f(50,90), contour of KOAM-DT on Channel 13. As indicated, the proposed predicted 57 dBu, f(50,90), contour fully encompasses Pittsburg.

With respect to possible Class A TV impact, a study was conducted according to the separation distances outlined in the FCC August-1998 Public Notice concerning DTV application processing. There were no LPTV or TV Translator facilities with Class A certification letters on file within these distances. Therefore, there is no adverse impact expected on any Class A TV stations.

[‡] The duTreil, Lundin & Rackley, Inc. DTV interference analysis program is a precise implementation of the FCC OET69 code on an Alpha-based processor computer system.
[§] See FCC *Public Notice*, "Additional Application Processing Guidelines for Digital Television (DTV)", Released: August 10, 1998.

It is evident from the above that the proposed Channel 13 allotment proposal would result in a preferential arrangement of FCC allotments.

Louis Robert du Treil, Jr., P.E.

December 5, 2000

ENGINEERING EXHIBIT
IN SUPPORT OF PETITION FOR RULE MAKING
TELEVISION STATION KOAM-TV
PITTSBURG, KANSAS

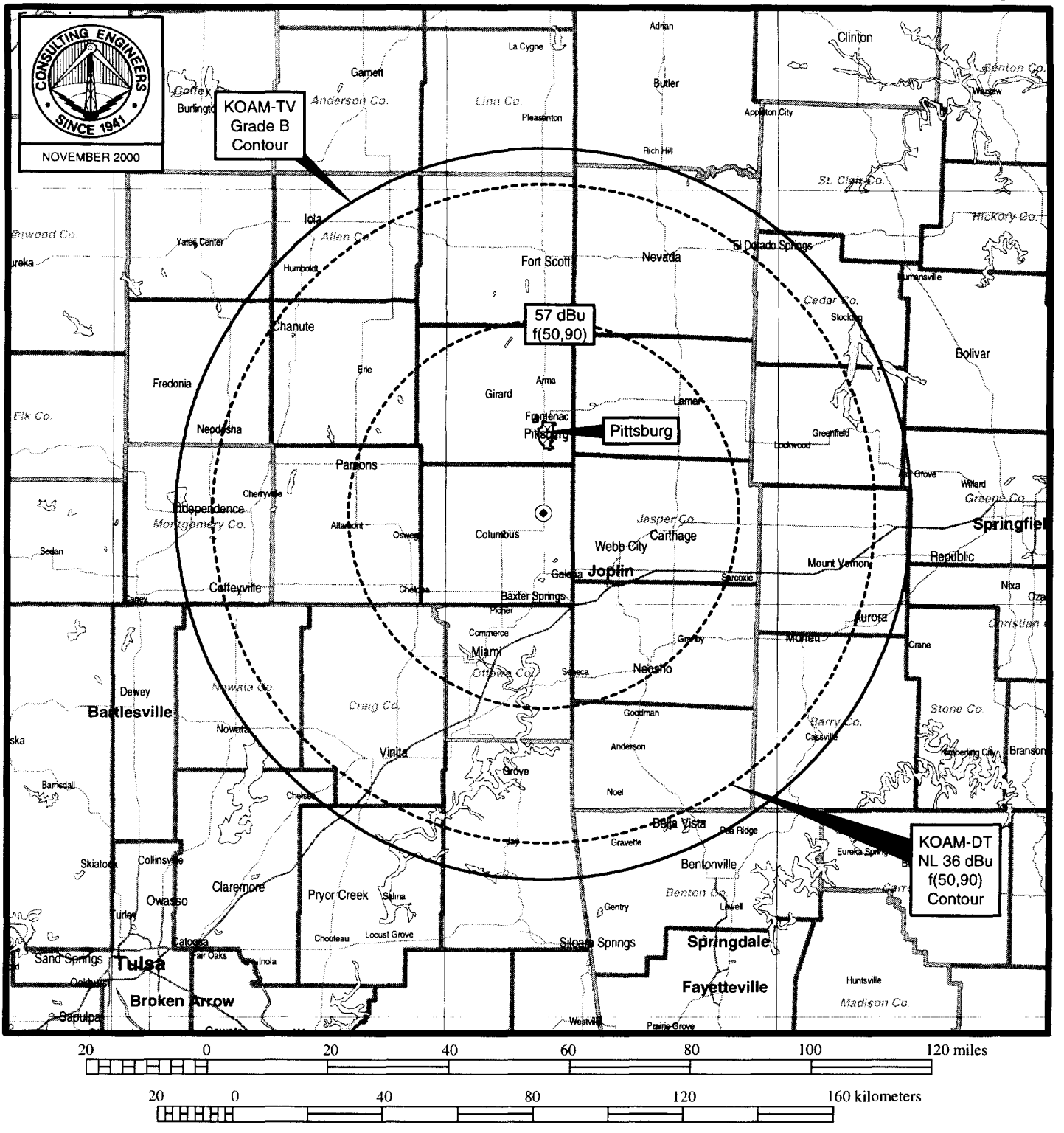
Summary of Allocation Analysis

Facility	Ch.	TV or DTV?	Baseline Service Population (1990)	Permissible IX (%)	Total IX Before Proposal (1990)	Net New IX Caused by Proposed (1990)	Percent of Baseline (%)
KODE-TV, Joplin-MO BLCT-19990702LD	12	TV	--	--	--	0	0.00
KETG-TV, Arkadelphia-AR BPRM-20000803AAA	13	DTV	--	--	--	0	0.00
KEMV-TV, Mountain View-AR BPRM-20000801AAD	13	DTV	--	--	--	0	0.00
KAFT(TV), Fayetteville-AR BLET-412	13	TV	751,688	2.0	53,188	14,669	1.95
WIBW-TV, Topeka-KS BLCT-2399	13	TV	663,005	2.0	57,501	2,314	0.35
KRCG(TV), Jefferson City-MO BLCT-19821013KG	13	TV	484,970	2.0	59,655	18	0.004
KETA-TV, Oklahoma City-OK BLET-19860929KE	13	TV	1,299,923	2.0	52,164	101	0.008

Note: Maximum interference scenario listed of all possible scenarios.

Figure 1
Sheet 1 of 1

Figure 2



PREDICTED COVERAGE COMPARISON

TELEVISION STATION KOAM-TV
PITTSBURG, KANSAS

du Treil, Lundin & Rackley, Inc. Sarasota, Florida